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May 21, 2024

VIA ECF

Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Alejandro Handal v. Tenet Fintech Group Inc.*,
1:21-cv-06461-PKC-RLM**

Dear Judge Chen:

We represent Lead Plaintiff Alejandro Handal in this securities class action. By letter dated April 8, 2024, we informed the Court that the parties have reached a settlement, in principle, resolving all claims against all defendants in this Action. (Dkt. No. 53). We alerted that Fed. R. Civ. P. 23(e) requires Court approval for the Settlement and sought a stay of proceedings, pending that approval. By Order dated April 11, 2024, the Court stayed the litigation, directing the parties to file an unopposed motion for preliminary approval of the Settlement by May 23, 2024, or to file a status report instead.

We have been working diligently since April 11, 2024, on a Stipulation of Settlement. While we are close to finalizing the Stipulation and exhibits, we are unable to file the motion for preliminary approval by May 23, 2024. Based on conversations with counsel for Defendants, we anticipate resolving all issues and filing the unopposed motion for preliminary approval of the Settlement, no later than May 31, 2024.

If the Court has any questions, please contact us.

Respectfully submitted,

/s/ *Jacob Goldberg*

Jacob A. Goldberg

cc: All counsel of record (via ECF)